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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of:)
)
MM Docket 99-25)
FCC 99-6)
Proposed Low-Power FM Service)

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Trident Media and Broadcasting, Ltd., an Illinois corporation, respectfully submits the following as an addendum to its previously filed comments regarding the proposed Low-Power FM (LPFM) radio broadcasting service.

Trident files this addendum in response to the grant of extension of the comment period on the proceeding of MM Docket 99-25 as requested by the National Association of Broadcasters. Trident raises the question of whether this request was well-founded or was an attempt to delay the development of the LPFM service in view of the fact that locally-oriented LPFM radio stations have great potential of competing extensively with current radio licensees and ultimately changing the entire image of radio broadcasting in the United States.

Trident retains its previous stance on the proposed LPFM service and supports its establishment. Trident feels that, due to the loss of localism and personality that has occurred in radio in recent years, a new radio broadcasting service is imperative to insure the protection of radio service in the public interest and the survival of the industry in general.

Trident places full trust in the determinations of the

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Commission that second- and third-channel adjacency separations are unnecessary in the case of LPFM stations. The lower power levels of LPFM stations likely will not produce sufficient sideband interference to necessitate minimum distance separation requirements from stations beyond two hundred kilohertz (200 kHz) removed. To further prove this point, "grandfathered" and otherwise short-spaced stations have broadcast for many years with no major problems or other conflicts, and the same would certainly be true of a lower power class of stations.

Trident also responds to the nature of comments filed to date on the proceeding of MM Docket 99-25. The Commission is respectfully requested to consider the large number of filings by the general public, most if not all of whom are crying out for this new radio broadcasting service. Trident feels that this public outcry is an unmistakable sign that radio in its current state is failing its listeners. In addition, a large number of the comments filed by current stations and broadcasting companies express concerns of what LPFM will do to their wealth and prestige, and indicate no concern for how it will affect their abilities to serve their listeners. This is an example of how radio's priorities have shifted away from the very people that it is intended to serve.

Finally, Trident has identified an FM frequency in its own city which would be available for LPFM radio broadcasts, and is hereby requesting special authority to construct and

operate a new station to operate at one thousand (1,000) watts on said frequency for the purposes of determining the interference contours, or lack of the same, between LPFM and full-service stations, and furthermore, for the purposes of proving the feasibility of the proposed LPFM service. Trident feels that guesswork and projections on paper are no match for a fully-operational LPFM station in determining how the proposed LPFM service will be most beneficial to the public.

Trident respectfully requests the Commission's careful and thorough consideration of these points in conjunction with its previously filed comments on this proceeding.

Respectfully Submitted,



Michael Scott Clem
President

Trident Media and Broadcasting, Ltd.

4 April 1999

In reply refer to:

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